

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

UNITED STATES OF AMERICA,	*	Docket No. 1:18CR00589
Plaintiff,	*	JUDGE CHRISTOPHER BOYKO
-vs-	*	
DWON A. WILLIAMS,	*	
Defendant.	*	

**DEFENDANT'S OBJECTIONS TO THE
PRE-SENTENCE INVESTIGATION REPORT (PSR)
AND POSITIONS REGARDING SENTENCING**

Now comes the Defendant, Dwon A. Williams, by and through counsel, and respectfully submits the following objections to his Presentence Investigation Report:

1. At the outset, it should be noted that the Defendant continues to accept responsibility. In making these objections, the Defendant in no way minimizes his conduct, as he recognizes that he has an extensive criminal history, however, he is hopeful that this Honorable Court sentences him in accordance to his guideline range and fashion a sentence no greater than necessary to effectuate the goals of sentencing under 18 U.S.C. §3553(a)(2).
2. The Defendant objects to paragraph 27 of the PSR and the total offense level attributed to the Defendant. A more accurate representation of the Defendant's criminal history would result in a lesser offense level. The Defendant's criminal history has been primarily low level drug related offenses, including the instant offense, which involved two controlled buys both of which were the lowest felony level drug transactions under the Ohio

Revised Code. The Career Offender designation over represents the seriousness of the Defendant's criminal history.

3. The Defendant objects to paragraph 36 of the PSR and the application of the career offender enhancement to the Defendant under U.S.S.G. §4B1.4. The Defendant maintains that he pled to the crime of Possession of Drugs, a third degree felony in violation of O.R.C. §2925.02(A). As such, the Defendant does not qualify as a career offender.

WHEREFORE, in light of the foregoing, the Defendant respectfully requests that this Honorable Court take into consideration the above objections prior to imposing the sentence on the Defendant.

Respectfully submitted,

/s/ Fernando Mack

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Objections to the Presentence Investigation Report (PSR) and Positions Regarding Sentencing was filed with the Court via its Electronic Filing System on October 21, 2019; notice of the filing will be transmitted to all parties by operation of the system

/s/ Fernando Mack

FERNANDO MACK (0062937)